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VIA ECF

September 25, 2023

Magistrate Judge Taryn Merkl
United States District Court – EDNY
225 Cadman Plaza East
Brooklyn, NY 11201

RE: Trooper 1 v. New York State Police et al. 1:22-cv-00893 (LDH) (TAM)

Dear Judge Merkl:

We represent non-party Alessandra Biaggi, a former New York State Senator who received a Rule 45 subpoena from Defendant Cuomo requiring production of several groups of documents.

Ms. Biaggi, like other non-party witnesses, did not know Trooper One, has never communicated with Trooper One, and has no first-hand information pertaining to the merits of this case.

We have met and conferred with Defendant Cuomo's counsel. We have also served written objections to the subpoena on Defendant Cuomo's counsel and asserted the relevance and related objections already pending before this Court in motions filed by other nonparties. In addition, for documents dated during her Senate service, Ms. Biaggi has asserted legislative privilege.

We respectfully request that we be permitted to attend tomorrow's conference and be heard on this matter.

Sincerely,

/s/
ALI NAJMI, ESQ.